

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

Cabanillas & Associates, PC
Paola D. Vera, Esq.
120 Bloomingdale Rd., Suite 400
White Plains, NY 10605
914-385-0292

In Re:

Case No.: 17-28199-KCF

Edwin Iza,

Debtor(s).

Hearing Date: 02/28/2018

Chapter: 13

Judge: Hon. Kathryn C. Ferguson

DEBTOR'S OPPOSITION TO MOTION FOR RELIEF
FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. 362(d)

The above named debtor, by and through his attorney of record, Paola D. Vera, Esq. of Cabanillas & Associates, P.C., hereby oppose Roundpoint Mortgage Servicing Corp.'s Motion for Relief from the automatic Stay, and in support thereof presents the Certification of Paola D. Vera, Esq. and shows unto the Court the following:

1. On September 6, 2017 the debtor filed a voluntary Chapter 13 petition with the clerk of this court.
2. On January 26, 2018, Roundpoint Mortgage Servicing filed a motion for relief and sought relief from the automatic stay.
3. The debtor has gathered his payments for the months of November, December, January, February, and March in the amount of \$12,261.45 and is able to make the full payment owed as well as continue to make regular monthly payments.

4. Debtor is able to make all past due mortgage payments with tax refund he is expecting to receive.

5. Moreover, the debtor has also been making his monthly trustee payments.

WHEREFORE, the debtor respectfully request that the instant Motion be denied; and the debtor be granted such other and further relief as this Court deems proper.

Dated: Union City, New Jersey
February 21, 2018

CABANILLAS & ASSOCIATES, PC

/s/Paola D. Vera
Paola D. Vera, Esq.
4100 Kennedy Blvd
Union City, New Jersey 07087